



1 responsible for other substantive non-litigation matters in the Office of General Counsel. The Office  
2 of General Counsel also currently has a number of attorneys out on leave of absence, in addition to  
3 staff attrition, which has increased the undersigned's workload.

4 Additional time is required to review the record, to evaluate the numerous issues raised in  
5 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's  
6 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as  
7 possible. This request is made in good faith and with no intention to unduly delay the proceedings,  
8 and counsel apologizes for any inconvenience.

9 On May 13, 2021, counsel for Defendant conferred with Plaintiff's counsel, who has no  
10 opposition to this motion.

11 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
12 to Plaintiff's Motion for Reversal and Remand, through and including June 7, 2021.

13  
14 Dated: May 13, 2021

Respectfully submitted,

15 CHRISTOPHER CHIOU  
16 Acting United States Attorney

17 /s/ Allison J. Cheung  
18 ALLISON J. CHEUNG  
19 Special Assistant United States Attorney

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21 IT IS SO ORDERED:

22 Raymond J. Zouchak  
23 UNITED STATES MAGISTRATE JUDGE

24 DATED: May 13, 2021  
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